

Mr. W. Scott Schaefer

Page 3.

May 1, 1998

On the business telephony side of our operation, we are also experiencing problems with the RCF fax process. While this situation didn't previously exist, it seems to have coincided with a change in BellSouth's Order Center personnel.

Concerning our request that the UNE Center be staffed on Saturdays to process our RCF requests, we await BellSouth's policy decision, which you indicated would be available in a week. As you know, MediaOne's expectation is parity with BellSouth's retail telephone operation.

An area not discussed in our meeting involves LENS log-in ID's. We currently have two, but require six. We have requested additional ID's from Ms. Reid, but have not been told when they will be available. We request that this information be provided in your letter.

#### Trunk Groups from Bell South to MediaOne

In late January, BellSouth and MediaOne agreed to a three-phase plan that BellSouth would implement to prevent the blocking of calls from the BellSouth network to MediaOne's switch. These blockages have occurred in August, 1997, in October, 1997, and, most severely, throughout the entire first week of January of this year. This situation and other problems that we have had were documented in my letter to Mark Feidler on January 13<sup>th</sup>.

Implementation of the first phase of this plan for 960 trunks was due on February 24. As of March 18, only 552 of these trunks had been implemented. I escalated this situation to you on March 19. Two weeks later, phase one was completed.

On March 19 we also discussed the second phase, due on March 24, for 1200 trunks. You gave assurances that this phase would only be missed by two or possibly three weeks. Of these 1200 trunks, 192 are to be installed today, but BellSouth has as yet provided no information as to when the remaining 1008 trunks will be completed. Implementation is now delayed far beyond what we were told to expect.

When the three-phase plan was agreed upon in January, phase three for 432 trunks was set for implementation in June. We are waiting for Roy Barnes to provide a firm date.

As you know, MediaOne has lost customers because of this blocking. The implementation of this plan is critical to our success. To date, all agreed-upon dates have been missed, and BellSouth's progress came only after MediaOne took steps to ensure your personal involvement. Even then, progress has been painfully slow. You must understand that this is an extremely frustrating process, and that we lack an understanding of any legitimate reasons that the original dates could not be maintained.

Mr. W. Scott Schaefer

Page 4.

May 1, 1998

#### Bell South T1 Circuits

Early last year, MediaOne began buying T1's from Bell South out of the 14 BellSouth central offices where our facilities are collocated. We use these "last mile" T1's to offer MediaOne dial tone to business customers. Because BellSouth had no unbundled tariff at that time, these T1's were purchased from the FCC tariff. Once the unbundled tariff, under which these circuits are much less expensive, became available, you agreed to process "records only" orders to move the T1's to the unbundled rate. This process started last fall with disastrous results for MediaOne and its customers. Whenever BellSouth processed an order, our customer was disconnected. Assurances were given repeatedly that you had fixed this problem, but the processing of each new order produced the same result -- our customers were disconnected. Obviously, this BellSouth failure was expensive to MediaOne in terms of lost revenues and highly inconvenient to our customers.

BellSouth put this process "on hold" while you developed a method of processing records orders without disconnecting our customers. Assurances were again provided that the problem had been resolved, and our customers were again disconnected. The process is again on hold. Pending a cure, MediaOne continues to dispute the "FCC rate" T1 bills. This is time-consuming and inconvenient. More importantly, however, MediaOne customers have lost patience with our excuses.

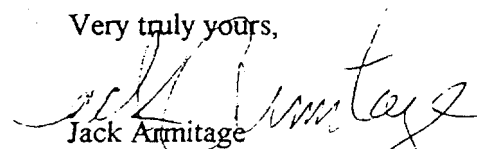
We are now told that you have a fail-safe process in place. Having been down this road several times, we are hopeful but skeptical that BellSouth has corrected the problem.

#### Account Management

As you know, we continue to seek improvements in your Account Management process. It is often difficult to contact Kim Reid. If our Account Manager provided a more thorough and timely presentation of our positions to BellSouth's operating personnel, the result would likely have been that many of the issues and problems discussed above would have been resolved.

We look forward to your response and hope that these concerns can be resolved so that formal processes will not be required.

Very truly yours,

  
Jack Armitage

V.P. Telephony & High Speed Data

JA/gh

cc: Greg Braden



BellSouth Telecommunications, Inc.  
Suite 4511  
876 West Peachtree Street, N.E.  
Atlanta, Georgia 30376

404 827-7020  
Fax 404 521-2311

W. Scott Scheerer  
President - Interconnection Services

May 6, 1998

Mr. Jack Armitage  
Vice President  
MediaOne Inc.  
2925 Courtyards Drive  
Norcross, GA 30071

Dear Jack,

We appreciated the opportunity to meet with you and Greg Braden on April 29, 1998, to address open issues between MediaOne and BellSouth. You can be sure that MediaOne has our full attention and support. Following are the issues discussed in the meeting and BellSouth's responses and/or action plans.

**Network Terminating Wire (NTW) in Multiple Dwelling Units (MDUs)** - BellSouth's policy is that NTW is part of its network. This view is consistent with the FCC's rules regarding inside wire and demarcation points. BellSouth currently has no intention of revisiting this policy. BellSouth makes NTW available to MediaOne as an Unbundled Network Element (UNE). Further, BellSouth has the necessary resources available to successfully implement BellSouth's NTW offering.

The pricing parameters stated in your agreement are accurate and are defined as follows. For the site preparation, you will be charged \$94.00 for each terminal. For subsequent visits to already prepared terminals, you will be charged \$33.50 per terminal, per visit. In addition to these charges, you will be charged \$.49 for each pair reserved.

In regards to the project to implement the NTW agreement between BellSouth and MediaOne, Robert Green (BellSouth Implementation & Maintenance) and Danny Daniel, (MediaOne) spoke on Monday, May 4, 1998. Danny has committed to call Robert back with a meeting time on Thursday, May 7, 1998. Formal methods and procedures for NTW at MDUs are being written and will be available to MediaOne on June 1, 1998. These will include specific instructions for installation, repair, and order processes and are being prepared by the NTW product team (Jerry Latham, Product Manager) whom you met on April 16, 1998. Many of these methods and procedures were provided to you verbally on April 16, 1998, and in a diagram format via e-mail on April 21, 1998.

**Interfaces for Remote Call Forwarding (RCF) and White Page Listings** - The EDI PC application is installed and working properly at MediaOne's Atlanta location. BellSouth will continue to track intervals for FOCs and due dates to ensure that the mechanized system is functioning properly. We currently have no plan to change the commitment of FOC turnaround from 48 hours to 24 hours. We are operating at parity across CLECs and as to installation intervals, we are providing parity with BellSouth's retail units. We will keep you updated of any change to our procedures.

BellSouth continues to strive toward faster turnaround of FOCs. Personnel are continually being added to the LCSC. During 1998, BellSouth has returned FOCs to MediaOne within less than 24 hours 29% of the time. Our expectations are that FOC receipt time will continue to decrease as further refinements to the processes are made.

We are working to obtain a more precise timeline from BellSouth's Operations Group regarding the turn-up of better mechanization of the ICONs database. We will provide you with a status concerning these efforts no later than May 25, 1998.

In addition, concerning the receipt of orders, a Purchase Order [PON] sent after 3:00 PM CST is counted as received the next business day. BellSouth continues the provisioning of RCF orders on Saturdays, however, we do not count new orders as accepted outside of normal business hours.

**Trunk Groups from BellSouth to MediaOne** - In our initial project planning meeting, BellSouth gave tentative dates and committed to confirm actual due dates as the phases commenced. We have learned from the delay in Phase I the critical nature of maintaining communications between our teams. We have turned up 188 trunks of the 1200 due in Phase II. Delays in this phase are due to trunk assignments, testing, and ST01 establishment and have been escalated within all appropriate centers. This project has our full attention. Roy Barnes (BellSouth Project Manager) continues to involve the MediaOne network team in all steps of the project and is currently negotiating due dates for the remainder of Phase II. In addition to Roy's contact with your network team, Kim Reid will keep you informed on the status of the remainder of Phase II and on Phase III implementation.

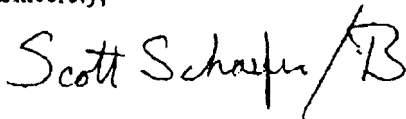
**Conversion of BellSouth T1 Circuits from Tariff to UNE** - Mitch Anderson (BellSouth Project Manager) and Ron Johnson (MediaOne) have partnered to make this project as seamless as possible to your end users. BellSouth realizes that the conversion of T1s ordered from the FCC tariff to UNEs may seem to MediaOne to be simply a "records only" change, however, the legacy systems have created complications and the disconnects experienced. BellSouth's legacy systems do not allow for automatic transmission of all sections of orders to the central office technician. This limitation has been identified as the source of the disconnects. We have added a layer of personnel to prevent future disconnects. Mitch Anderson is in personal contact with each central office technician to explain the intent of the orders so that they fully understand that this is indeed "records only." We apologize for past inconveniences and have made every effort to prevent recurrence of disconnects. There are 80 circuits left to convert in this project; Ron Johnson has asked that we convert these in quantities of 5 to further minimize customer outages. Mitch Anderson will maintain contact with ordering personnel as well as the specific Central Office Technicians to ensure proper handling of the conversions. We will continue to monitor this project at a high level.

**Account Management** - You are encouraged to continue to engage the account team for support. The account team is equipped to provide customer support, address issues regarding roadblocks and repetitive problems in interfacing with BellSouth's operational centers. MediaOne has also been provided escalation procedures applicable to each BellSouth Operations Center that interfaces with MediaOne. We strongly urge you to utilize these procedures. Kim Reid and her team have the authority to take necessary action in the advocacy of CLEC customers in her module. They also have the support of, and complete access to, BellSouth Senior Management should their engagement be required to resolve critical issues. In response to MediaOne's need for increased support, BellSouth has realigned the account team assignments. Kim can now through the realignment provide additional attention to MediaOne. By involving Kim in your network plans, order forecasts, and business opportunities, she will be more able to assist you in maximizing efficiencies with BellSouth.

Kim is committed to continue in her efforts to make MediaOne a satisfied customer. Outside of direct account team involvement, BellSouth has made many resources available to CLECs via the Internet. Further, probably of utmost interest to your company, BellSouth has recently implemented an Interconnection Purchasing Center. The Center is dedicated to managing CLEC switch deployments, NXX turn-ups, reciprocal billing, and interconnection trunking.

Again, let us continue to work together toward a positive business relationship between our companies. Your satisfaction is the key to your account team's success. As I stated in our meeting, my personal involvement in supporting MediaOne has been consistent and I will continue to support your account team.

Sincerely,

Handwritten signature of Scott Schaefer in cursive, followed by a large stylized 'B' or 'S' mark.

W. Scott Schaefer  
President - Interconnection Services

cc: Greg Braden - MediaOne  
Kim Reid - BST  
Joe Baker - BST  
Bill McNair - BST  
Mike Cassity - BST  
Ralph de la Vega - BST



**This is Broadband. This is the way.**

May 8, 1998

Mr. W. Scott Schaefer  
President-Interconnection Services  
BellSouth Telecommunications, Inc.  
Suite 4511  
876 West Peachtree Street, N.E.  
Atlanta GA 30375

Dear Scott:

Thank you for your prompt response following up on our meeting of April 29, 1998. You indicate that MediaOne has BellSouth's "full attention and support". My emphasis in the weeks and months immediately ahead will be to provide you with the opportunity to prove that your statement is genuine and not rhetorical.

I have a number of comments on your letter.

#### **Network Terminating Wire (NTW) in Multiple Dwelling Units (MDUs)**

You state that BellSouth has no intention to revisit its policy that NTW is part of its network. We will continue to work to understand the legal underpinnings of that position, but are anxious to work with you on methods, procedures and support processes.

I explained in my letter of May 1, that your position imposes an operational burden on MediaOne. As your methods are documented, we will make clear to you the implications of your position for our ability to do business. We are, as you know, particularly concerned that your position virtually guarantees customer inconvenience, just as it will result in substantially increased operating costs for MediaOne. Nonetheless, we are anxious to move ahead with an exploration of your proposed approach. To that end, a meeting was held between our two companies' teams yesterday that crystallized a number of the operational and cost issues. We will communicate specific concerns in the near future.

#### **Interfaces for Remote Call Forwarding (RCF) and White Page Listings**

You indicated that BellSouth is operating at parity between CLECs and its own retail units with regard to installation intervals. We will continue to seek parity with regard to all aspects of the relationship.

It would be helpful if we could understand your interval for RCF at the retail level. We would appreciate it if you would share an explanation of that process. Further, it is unclear how your processes will be able to support a 24-hour interval for long-term number portability, while the same interval seems to be unachievable for interim number portability.

2925 Courtyards Drive

We today provided Kim Reid with a list of 26 service orders that have been pending for longer than 48 hours. We have yet to receive a firm order confirmation for a number of these orders, and we have requested that Kim provide assistance.

Norcross, GA 30071

tel / 770-613-2424

fax / 770-613-2382

**Trunk Groups from BellSouth to MediaOne**

You explained that the experience in provisioning of trunks in Phase I of the plan for corrective action had educated BellSouth as to "the critical nature of maintaining communication between our teams". The reference to "our teams", I assume, is to interaction among BellSouth's internal work groups and not to the exchange of information between MediaOne and BellSouth. In other words, I am concerned that your letter may create the impression that MediaOne contributed to the deficiency of BellSouth trunking to its facilities. Quite to the contrary, this was and remains a serious BellSouth failing. I note with interest that your letter made no commitments regarding Phases II and III, but only stated that we would be kept apprised of the status of the project. This is small comfort.

**Conversion of BellSouth T1 Circuits from Tariff to UNE**

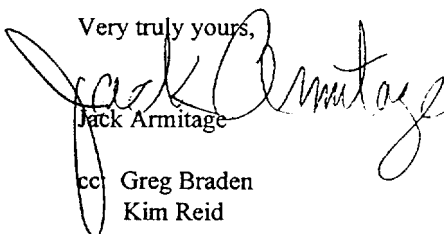
You apologize for past inconvenience that resulted from BellSouth's repeated termination of our customers, explain that the terminations have resulted from your information system limitations, and indicate an intent to "monitor this project at a high level". Again, this series of problems has resulted from BellSouth's inability to manage its processes, and not by reason of any actions or inactions by MediaOne or its personnel. Your apology is appreciated, but correction of the problem is what we continue to seek.

**Account Management**

We will, as you suggest, continue to work with Kim Reid. We will begin using status sheets to monitor the progress of issues, and will copy you on materials as we believe appropriate. In this way we will try to keep your personal involvement meaningful and "real time" in nature.

In conclusion, Scott, I want to thank you for your prompt response. I look forward to working with you to make the effective cooperation of our companies a reality.

Very truly yours,



Jack Armitage

cc: Greg Braden  
Kim Reid

**BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION  
ATLANTA, GEORGIA**

IN RE:

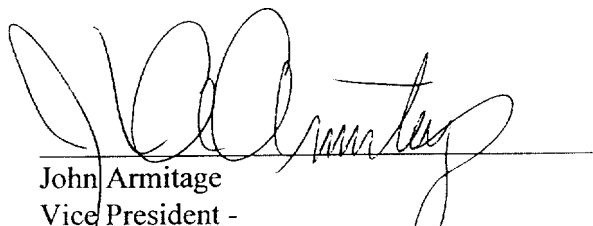
**BELLSOUTH TELECOMMUNICATIONS,  
INC. STATEMENT OF GENERALLY  
AVAILABLE TERMS AND CONDITIONS  
UNDER SECTION 252(F) OF THE  
TELECOMMUNICATIONS ACT OF 1996**

**DOCKET NO. 7253-U**


**AFFIDAVIT**

STATE OF GEORGIA       )  
                                  )  
COUNTY OF FULTON     )

Personally appeared before the undersigned authority, JOHN ARMITAGE, who after being duly sworn states on oath that he is an agent of MediaOne, Inc., and that the foregoing Appendix A of MediaOne, Inc. to the best of his knowledge, information and belief is true and correct.

  
\_\_\_\_\_  
John Armitage  
Vice President -  
Telephony and High Speed Data  
MediaOne, Inc.

Sworn to and subscribed  
before me this 21 day  
of May, 1998.

  
\_\_\_\_\_  
Notary Public  
My Commission Expires:

**MY COMMISSION EXPIRES  
MAY 18, 2001**

CERTIFICATE OF SERVICE

I certify that I have this day served a copy of the foregoing Comments of MediaOne, Inc. in Docket No. 7253-U upon the following persons by causing copies of the same to be placed in an envelope with adequate postage affixed thereon and deposited in the United States Mail addressed as follows:

Stacy Ferris-Smith  
Assistant Attorney General  
40 Capitol Square  
Suite 132  
Atlanta, Georgia 30334

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Consumers' Utility Counsel Division  
Office of Consumer Affairs  
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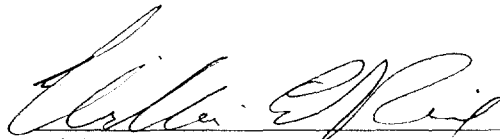
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Dow Lohnes & Albertson  
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Atlanta, Georgia 30346

This 22<sup>nd</sup> day of May, 1998.



William E. Rice

542147

## ATTACHMENT C

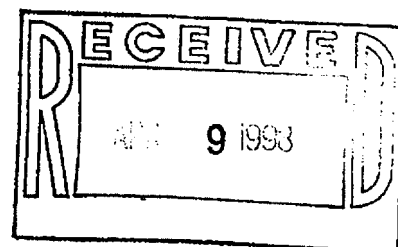


U. S. Department of Justice

Antitrust Division

City Center Building  
1401 H Street, NW  
Washington, DC 20530

March 6, 1998



Liam S. Coonan, Esq.  
Senior Vice President and  
Assistant General Counsel  
SBC Communications, Inc.  
175 E. Houston Street  
San Antonio, Texas 78205

Re: SBC Performance Measures

Dear Mr. Coonan:

As part of the Department's commitment to work with all Bell companies on relevant issues in advance of their section 271 applications, the Department of Justice and SBC Communications, Inc. ("SBC") have, as you know, been spending considerable time discussing issues relating to wholesale support processes and performance measures. In that regard, you have provided us with a draft list of proposed performance measures, a list that you have supplemented as our discussions have progressed.

Attachment A is a comprehensive list of performance measures. With the qualifications set forth below, we are satisfied that the performance measures listed in Attachment A, to which SBC has agreed,<sup>1</sup> would be sufficient, if properly implemented, to satisfy the Department's need for performance measures for evaluating a Section 271 application filed in the not-too-distant future.

We appreciate SBC's engagement with the Department on satisfying our competitive assessment in advance of a filing and look forward to working with you on additional related issues. One such issue is whether the performance measures in Attachment A have been "properly implemented," since the majority of our discussions have dealt with the performance measures themselves and since it is upon the actual measures that this letter focuses. As you can appreciate, there are important repercussions that may arise from how the measures are implemented. For example, definitional issues and other details connected with the measures themselves (such as

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<sup>1</sup> As we have discussed with you, the Department has agreed to narrow variances from Attachment A in light of certain SBC processes and procedures. Specifically, we have agreed that SBC need not provide separate operator services and directory assistance speed-of-answer measurements for branded and unbranded calls and that SBC can limit its 911 measurements to an error-clearing interval measure that is presently under development.

the basis upon which due dates and start and stop times are set in particular measures) could significantly affect the meaning of the data. Thus, because we have not yet reached agreement on issues such as data retention, presentation, and reporting (e.g., disaggregation, reporting intervals and formats), and analysis, we expect that Department staff and SBC will continue to work towards resolution of these issues. We also expect that Department staff and SBC will discuss performance standards and benchmarking, other important aspects of the Department's performance analysis.

Moreover, while we are satisfied at the present time that the measures set out in Attachment A would, if properly implemented, suffice for present purposes, performance measurement is a dynamic area and future developments could necessitate changes in our views of appropriate performance measures. For example, while the measures listed in Attachment A are structured to cover the provision of unbundled network elements, once it becomes clear how ~~unbundled~~ network elements will be provided so as to allow requesting carriers to combine such elements in order to provide a telecommunications service, we may find that other measures are necessary to assess performance in this situation. In addition, the development of new services or new methods of providing existing services could necessitate additional performance measures. Alternatively, through ongoing regulatory proceedings, our own investigation, or otherwise, we might learn of additional risks, and even occurrences, of discrimination of which we were not previously aware. Accordingly, we would expect SBC to implement additional measures or modifications to existing measures should it become apparent to the Department that they are necessary. On the other hand, developments might reveal that certain measures were no longer necessary and could be eliminated.

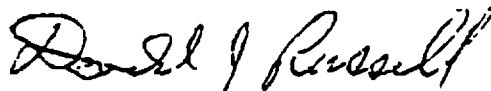
Our satisfaction with the performance measures set out in Attachment A must be placed in its proper context. First, it is limited to the Department's application of its competitive standard. Under section 271, the Department is to evaluate applications for Bell entry using "any standard" the Department believes is appropriate, and the FCC is required to give "substantial weight" to that evaluation. As we have explained, our standard, in addition to the specific statutory prerequisites, requires a demonstration that local markets in a state have been "fully and irreversibly opened to competition," and appropriate performance measures, standards, and benchmarks are important to the Department's application of our competitive standard.

Second, our conclusions relate only to the Department's evaluation of section 271 applications and should not be construed as an expression of the Department's views concerning the appropriate resolution of any federal or state regulatory proceeding relating to performance measures. The FCC and some state commissions have ongoing proceedings considering both performance measures and performance standards, including company-specific and state-specific issues. These proceedings may produce performance measures different from, or in addition to, those described in Attachment A.

I am hopeful that we can resolve the remaining issues expeditiously through our ongoing discussions. I appreciate your cooperation in addressing these issues and look

forward to our continuing mutual efforts. If you have any questions or suggestions regarding these issues, please call.

Sincerely,

A handwritten signature in cursive script, reading "Donald J. Russell".

Donald J. Russell  
Chief  
Telecommunications Task Force

**SOUTHWESTERN BELL**  
**SECTION 271 PERFORMANCE MEASUREMENTS**

**60. Measurement - Operator Services Grade Of Service.**

**Definition** - % of operator services calls answered < 1.5, < 2.5, > 7.5, > 10.0, > 15.0, > 20.0, and > 25.0 seconds.

**Calculation** - Calls answered within "x" seconds ÷ total calls answered.

**Report Structure** - Reported for the aggregate of SWBT and CLECs.

**61. Measurement - Operator Services Average Speed Of Answer.**

**Definition** - The average time a customer is in queue. The time begins when the customer enters the queue and ends when the call is answered by a SWBT representative.

**Calculation** - Total queue time ÷ total calls.

**Structure** - Reported for the aggregate of SWBT and CLECs.

**VII. INTERIM NUMBER PORTABILITY (INP)**

**62. Measurement - % Installation Completed Within "x" (3, 7, 10) Business Days.**

**Definition** - % installations completed within "x" (3, 7, 10) business days excluding customer caused misses and customer requested due dates greater than "x" (3, 7, 10) business days.

**Calculation** - Total INP orders installed within "x" (3, 7, 10) business days ÷ total INP orders.

**Report Structure** - Reported for CLEC and all CLECs.

**63. Measurement - Average INP Installation Interval.**

**Definition** - Average business days from application date to completion date for INP orders excluding customer requested due dates greater than the SWBT standard interval.

**Calculation** - (Total business days from application to completion date for INP orders ÷ total INP orders) \* 100.

**Report Structure** - Reported for CLEC and all CLECs.

**SOUTHWESTERN BELL**  
**SECTION 271 PERFORMANCE MEASUREMENTS**

**64. Measurement - Percent INP I-Reports Within 30 Days.**

**Definition** - Percent of INP N,T,C orders that receive a network customer trouble report not caused by CPE or wiring within 30 calendar days of service order completion excluding subsequent reports and all disposition code "13" reports (excludable reports).

**Calculation** - (Count of INP N,T,C orders that receive a network customer trouble report within 30 calendar days of service order completion ÷ total INP N,T,C orders (excludes trouble reports received on the due date)) \* 100.

**Report Structure** - Reported for CLEC and all CLECs.

**65. Measurement - Percent Missed Due Dates.**

**Definition** - Percent of INP N,T,C orders where installations are not completed by the negotiated due date excluding customer caused misses.

**Calculation** - (Count of INP N,T,C orders with missed due dates excluding customer caused misses ÷ total number of INP N,T,C orders) \* 100.

**Report Structure** - Reported for CLEC and all CLECs.

**VIII. 911 (See Attachment 4)**

**66. Measurement - Average Time To Clear Errors.**

**Definition** - The average time it takes to clear an error is detected during the processing of the 911 database file.

**Calculation** -  $\Sigma(\text{Date and time error detected} - \text{date and time error cleared}) \div \text{total number of errors}$ .

**Report Structure** - Reported for CLEC, all CLECs and SWBT.

**NOTES:**

1. Measurements will be reported on a Market Area Basis.
2. Measurements for POTS resale will be broken down by business and residence.
3. Specials will be broken down by Voice Grade Private Line (VGPL), DDS, DS1, DS3 and ISDN.

**CERTIFICATE OF SERVICE**

I hereby certify that on this 1st day of June, 1998, I caused a copy of the foregoing  
"Comments of MediaOne, Inc." to be sent by messenger (\*) or by first-class, postage prepaid,  
U.S. Mail, to the following:

  
Brett Howard

\*A. Richard Metzger, Jr.  
Chief  
Common Carrier Bureau  
Federal Communications Commission  
Room 500  
1919 M Street, N.W.  
Washington, D.C. 20554

\*John Nakahata  
Chief of Staff  
Office of Chairman Kennard  
Federal Communications Commission  
Room 814  
1919 M Street, N.W.  
Washington, D.C. 20554

\*Tom Power  
Legal Advisor  
Office of Chairman Kennard  
Federal Communications Commission  
Room 814  
1919 M Street, N.W.  
Washington, D.C. 20554

\*James Casserly  
Senior Legal Advisor  
Office of Commissioner Ness  
Federal Communications Commission  
Room 832  
1919 M Street, N.W.  
Washington, D.C. 20554

\*Paul Gallant  
Legal Advisor  
Office of Commissioner Tristani  
Federal Communications Commission  
Room 826  
1919 M Street, N.W.  
Washington, D.C. 20554

\*Kevin Martin  
Legal Advisor  
Office of Commissioner Furchtgott-Roth  
Federal Communications Commission  
Room 802  
1919 M Street, N.W.  
Washington, D.C. 20554

\*Kyle Dixon  
Legal Advisor  
Office of Commissioner Powell  
Federal Communications Commission  
Room 844  
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Washington, D.C. 20554

\*Richard K. Welch  
Deputy Bureau Chief  
Common Carrier Bureau  
Federal Communications Commission  
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Washington, D.C. 20554

\*Carol E. Matthey  
Chief  
Policy and Program Planning Division  
Common Carrier Bureau  
Federal Communications Commission  
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